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Submitted via ECF

April 19, 2021

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

RE: *United States v. David Blaszczak et al.*, No. 17 Cr. 357 (LAK)
Bail Modification Request for Christopher Worrall

Dear Judge Kaplan:

We write on behalf of Christopher Worrall to respectfully request a modification to Mr. Worrall's bail conditions. On April 9, 2021, this Court granted Mr. Worrall's motion for bail pending appeal, noting the posture of this matter and that Mr. Worrall is not a flight risk. ECF No. 489. On April 16, 2021, the Second Circuit adjourned argument in the pending appeal, which is on remand following the order of the Supreme Court vacating the Second Circuit's prior affirmation of the convictions of Mr. Worrall and his co-defendants, and held Mr. Worrall's emergency motion for reversal of his conviction in abeyance. 2d Cir. ECF No. 470.

Mr. Worrall's current bail conditions permit him to travel only in Maryland, where he lives, the Southern and Eastern Districts of New York, between Maryland and the Southern District of New York for court appearances and meetings with his counsel, and to Pennsylvania, Washington, D.C., and Virginia for work purposes. In light of the delay in the resolution of this matter before the Second Circuit and the government's concession of error with respect to the two counts of which Mr. Worrall was convicted, see ECF No. 487 at 2 (explaining same), Mr. Worrall respectfully requests that his bail be modified such that he can travel anywhere within the continental United States with the advance approval of his pre-trial services officer.

We have communicated with Mr. Worrall's pre-trial services officer in the District of Maryland and his officer does not object to this request.¹ We have alerted the government, which likewise does not object to this request.

¹ We understand that Mr. Worrall's pre-trial services officer also consulted with the pre-trial services office for the Southern District of New York, which likewise does not object to this request.

The Honorable Lewis A. Kaplan
April 19, 2021

Respectfully submitted,

s/ John Nathanson
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